

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE**

<b>CHRISTIE ANDREWS,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>CASE NO. 3:21-cv-00526</b>
	)	
<b>v.</b>	)	<b>Judge Eli J. Richardson</b>
	)	<b>Magistrate Judge Jefferey S. Frensley</b>
<b>TRI STAR SPORTS AND</b>	)	
<b>ENTERTAINMENT GROUP, INC.,</b>	)	
	)	<b>JURY DEMAND</b>
<b>Defendant.</b>	)	

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**TRI STAR SPORTS AND ENTERTAINMENT GROUP, INC.’S  
MOTION FOR EXTENSION OF TIME TO RESPOND TO DISCOVERY REQUESTS**

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Pursuant to Local Rule 7.01, Defendant Tri Star Sports and Entertainment Group, Inc. (“Tri Star” or “Defendant”) respectfully moves this Court for an extension of time to respond to Plaintiff’s Second Set of Requests for Production, Requests for Admission, and Interrogatories.

Plaintiff served a Second Set of Requests for Production, Requests for Admission, and Interrogatories on Defendant by email on February 13, 2022, making Defendant’s responses due on March 15, 2022.<sup>1</sup> Defendant is working diligently on its responses and on collecting and reviewing responsive information, but needs additional time to complete the document review and responses, as the point of contact for Tri Star has been out and Defendant’s counsel will be traveling during the week of March 14.

Undersigned counsel requested that Plaintiff’s counsel agree to a 16 day extension, so that the responses would be due on March 31, 2022, but Plaintiff’s counsel would only do so if Tri Star also agreed to allow Ms. Andrews until March 31 to respond to discovery that has been outstanding since November 9, 2022. Defense counsel regularly agrees to discovery extensions in litigation

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<sup>1</sup> The certificate of service incorrectly reflects a service date of February 11, 2022.

where necessary and reasonable, as is common with members of this bar, and, in fact, had already extended Ms. Andrews's deadline to respond to the November 9 discovery until March 9 – four months after it was initially served.<sup>2</sup> Tri Star could not agree to extend Ms. Andrews's deadline even further in order to get its own extension. As a result, Tri Star has filed this Motion.

For these reasons, Tri Star respectfully requests that its time to respond to the Second Set of Requests for Production, Requests for Admission, and Interrogatories be extended by sixteen days, until March 31, 2022. This short extension will not unduly delay this litigation and will not affect any of the deadlines currently in place.

Respectfully Submitted,

/s/ Elizabeth G. Hart  
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*Attorneys for Tri Star Sports &  
Entertainment Group, Inc.*

### **CERTIFICATE OF CONFERENCE**

I hereby certify that I conferred with counsel for Plaintiff in an effort to resolve this dispute without court action, but those efforts were unsuccessful as Plaintiff's counsel objected to the requested extension.

/s/ Elizabeth G. Hart  
Elizabeth G. Hart

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<sup>2</sup> Notably, March 9 has now passed and Ms. Andrews still has not provided complete discovery responses, though the deadline has not been extended by agreement or by this Court.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served via the Court's Electronic Filing System on:

Roland Mumford  
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roland@mumfordlaw.net

Daniel Eduardo Arciniegas  
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on this 10<sup>th</sup> day of March 2022.

/s/ Elizabeth G. Hart  
Elizabeth G. Hart